



Alexandra E. Blackmore  
*Senior Attorney*

April 3, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

**Re: D.T.E. 05-82; Comments of Massachusetts Electric Company d/b/a National Grid**

Dear Secretary Cottrell:

I am submitting for filing one copy of the comments of Massachusetts Electric Company d/b/a National Grid in the above-captioned proceeding.

Thank you very much for your time and attention to this matter.

Very truly yours,

A handwritten signature in black ink that reads "Alexandra E. Blackmore".

Alexandra E. Blackmore

cc: Joseph W. Rogers, Office of the Attorney General  
Service List

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**RE: PETITION OF DIG SAFE SYSTEM,  
INC. FOR IMPLEMENTATION OF  
811 AS THE ABBREVIATED  
DIALING CODE FOR PROVIDING  
NOTIFICATION OF EXCAVATION  
ACTIVITIES TO UNDERGROUND  
FACILITIES OPERATORS WITHIN  
MASSACHUSETTS**

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**D.T.E. 05-82**

**COMMENTS OF  
MASSACHUSETTS ELECTRIC COMPANY D/B/A NATIONAL GRID**

Massachusetts Electric Company d/b/a National Grid (“National Grid” or “Company”) submits these comments in connection with the Massachusetts Department of Telecommunications and Energy’s (the “Department’s”) Docket D.T.E. 05-82, regarding the “Petition of Dig Safe System, Inc. for Implementation of 811 as the Abbreviated Dialing Code for Providing Notification of Excavation Activities to Underground Facility Operators Within Massachusetts.” The Department’s Procedural Notice in this proceeding, dated March 10, 2006, seeks comments from the parties on a variety of issues raised by Dig Safe’s petition. Under Chapter 82, Section 40B of the Massachusetts General Laws, as an operator of underground facilities, National Grid is obligated to respond to notices from the underground plant damage prevention system by marking its facilities. In the operation of its electric system, National Grid often excavates within the Commonwealth. As an excavator, National Grid is obligated to notify the underground plant damage prevention system of planned excavations so that National

Grid and other underground facility operators receive notice to mark their facilities. National Grid respectfully submits these comments in the above-captioned docket.

**1. Steps Needed to Implement 811.**

(a) By Dig Safe System, Inc. – The Federal Communications Commission Order on the implementation of 811 (the “FCC Order”) requires “One Call Centers to notify carriers of the toll-free or local number the One Call Center uses in order to ensure that callers do not incur toll charges.” *FCC Order: FR Vol. 70, No. 70 at pg. 19321*. Dig Safe System, Inc. has the required toll-free number in service and has completed the required notifications.

(b) By telecommunications carriers – By April 13, 2007, telecommunications carriers are required to use “811 as the national abbreviated dialing code for providing advanced notice of excavation” and are allowed to use either the Numbering Plan Area or originating switch to determine the appropriate one call center to which a call should be routed. *FCC Order: FR Vol. 70, No. 70 at pg. 19321*.

(c) By users of the one call system – Users of the one call system fall into two categories: underground facility operators and excavators. Underground facility operators will need to take no steps in order to implement 811 as the abbreviated dialing code for providing notification of excavation activities. Underground facility operators receive and respond to notifications from the one call center operated by Dig Safe and will continue to receive and respond to those notifications in the same way. After 811 is implemented by the telecommunications carriers, excavators will be able to reach the one call center operated by Dig Safe toll-free by dialing 811 rather than by dialing the existing 10-digit toll-free number (888-DIG-SAFE or 888-344-7233).

2. 811 Implementation Schedule.

The FCC Order requires implementation of 811 by telecommunications carriers within two years of the publication of the order in the Federal Register. *FCC Order: FR Vol. 70, No. 70 at pg. 19321*. This publication occurred on April 13, 2005 and telecommunications carriers are required to implement 811 by April 13, 2007.

3. 811 Implementation Costs.

The FCC Order requires one call centers to provide a toll-free number, requires “the use of 811 as the national abbreviated dialing code for providing advanced notice of excavation” by telecommunications carriers and allows them to use the Numbering Plan Area or originating switch to determine the appropriate one call center to which a call should be routed. *FCC Order: FR Vol. 70, No. 70 at pg. 19321*. The FCC Order places an obligation on telecommunications carriers to implement 811 by directing calls to the toll-free number supplied by the one call center, Dig Safe. The cost of the toll-free number will be borne by Dig Safe. The costs of implementing 811 so that calls are directed to the toll-free number supplied by Dig Safe will be borne by the telecommunications carriers.

4. Need for Hearings.

National Grid does not see a need for evidentiary hearings in this proceeding.

WHEREFORE, National Grid respectfully submits these comments to the Department.

Massachusetts Electric Company d/b/a  
National Grid

By its attorney,

April 3, 2006

*Alexandra E. Blackmore*

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Alexandra E. Blackmore

Senior Attorney

National Grid

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CERTIFICATE OF SERVICE

I certify that copies of the foregoing document have been served this date on all persons named on the service list in Docket D.T.E. 05-82.

*Alexandria E. Blackmore*  
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Alexandra E. Blackmore, Esq.

April 3, 2006